Betsy J. Brady
Federal Government Affairs
Director and Attorney

Suite 1000
1120 20th Street, N.W.
Washington, DC 20036
202 457-3824
FAX 202 457-2545

May 22, 1996

Mr. William F. Caton
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RE: Ex Parte Presentation
[CC Docket 95-116]

Dear Mr. Caton:

On May 22, 1996, Frank Simone and I provided and discussed the attached documents to James Casserly, and separately with Daniel Gonzalez and Eileen Duff, in connection with the above-captioned docket.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's rules.

Sincerely,

Betsy J. Brady

Attachment

cc: J. Casserly
D. Gonzalez
E. Duff

CC Docket No. 95-116

Telephone Number Portability

AT&T Corp.

May, 1996

Telephone Number Portability
CC Docket No. 95-116

Summary Position

The number portability capability is critical to the development of local exchange competition and LRN is the foundation upon which number portability will be built

I. *Architecture*

- LRN presents the only permanent number portability architecture that fulfills the requirements of the 1996 Act and its deployment should proceed expeditiously, beginning in the third quarter 1997.
- The LRN call model is a component of all currently proposed LNP architectures. Variations on LRN should not delay LRN implementation but should be examined by the Industry to determine their costs relative to LRN and to understand all technical issues which may be raised by their implementation.
- Based on the extensive work effort by the Industry and state commissions there is broad support behind LRN.

II. *Cost Recovery*

- Each N-1 carrier should be responsible for recovery of its own internal network implementation costs
- LNP costs should not be recovered through access charges.
- LNP costs should not receive exogenous treatment for price cap regulated ILECs.
- New entrants should determine their own cost recovery mechanisms and not be required to recover costs in any specific manner, e.g., end user surcharges.

III. *Industry Implementation Costs*

- AT&T estimates the industry cost for deploying LNP to be approximately $1.7B (exchange), $100M (interexchange)
- Additional costs for the NPAC/SMS capability will be approximately $25M for deployment and $75M annually to operate the system

Telephone Number Portability
CC Docket No. 95-116

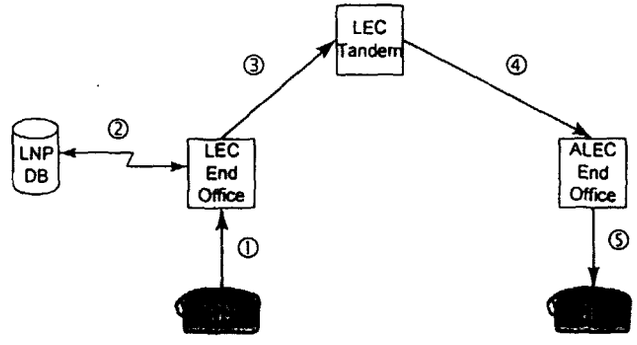
Commission Action

Action	Rationale
Set deployment schedule that ILECs must follow	
- Order LNP to be available beginning 3Q97. - Request that the industry develop an implementation schedule for reaching the top 105 MSAs by 3Q98.	- Rigorous evaluations already performed by the industry and many state commissions identified a permanent portability solution. - The record developed before the state commissions and the FCC establishes number portability can be available beginning 3Q97.
Determine the manner in which number portability will be provided	
- Order a national number portability architecture -- LRN. - Order adaptions to LRN be examined by the industry while simultaneously deploying the base LRN call model. - Order 3Q96 SMS RFP process and specify a deadline for selecting the vendor. - Require operation by 3Q97.	- All solutions currently being considered use the LRN routing architecture. - If and when they are available, efficient, competitively neutral variations to the base LRN call model can be deployed incrementally. - A uniform SMS RFP process, modeled after the state efforts, will insure a consistent, cost effective system.
Address the recovery of number portability costs	
- Order internal network costs to be borne by each carrier. - Specify costs should not be recovered through access charges. - ILECs costs should not receive exogenous treatment. - User surcharges should not be imposed on new entrants. - Industry SMS costs should be shared in a competitively neutral manner.	- Competitively neutral and proportionate cost recovery recognizes all customers will benefit from LNP because it is essential for meaningful local exchange competition. - ILEC recovery of LNP costs through access increases causes the industry to subsidize the deployment of ILEC network upgrades.

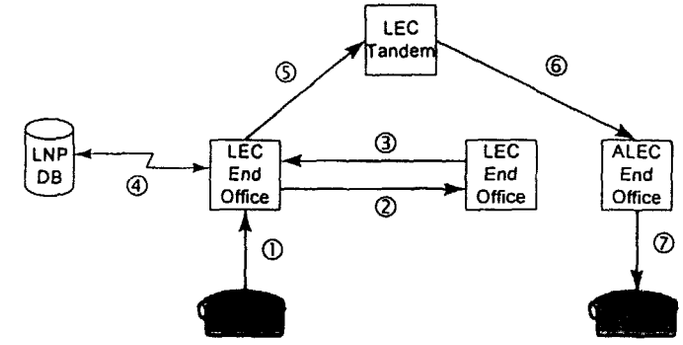
Telephone Number Portability
CC Docket No. 95-116

LNP Call Routing

Location Routing Number



Query On Release



Telephone Number Portability
CC Docket No. 95-116

Number Portability Architecture

LRN is a component of all currently proposed solutions and its deployment should proceed beginning 3Q97

- LRN* has consistently been rated the best routing architecture by state workshops which have evaluated the available alternatives.

- The QOR solution is being designed to eventually transition to LRN.
  - *"the core of this work will be to provide an analysis on the technical and economic feasibility of implementing QOR and transitioning at some time to an N-1 (LRN) solution."*

    - See Letter to D. Smith, VP-Sales, Ericsson, et. al. from J.W. Seaholz, Chief Technology Officer, Bell Atlantic, et. al., dated March 18, 1996 -

  - QOR uses the LRN call model for all calls to numbers which have been ported to another carrier and on all operator handled calls.

- Since LRN is a component of all solutions, its deployment should proceed unimpeded by discussions about variations to the base LRN call model.

* described by: Generic Switching & Signaling Requirements, Iss. 1.0, Generic Application Requirements, Iss. 1.0, and Generic Operator Services Switching Requirements, Iss. 1.0

Telephone Number Portability
CC Docket No. 95-116

Number Portability Architecture

The Commission should not delay LRN implementation

• Proposals to improve the efficiency of the LRN architecture can be added incrementally as information about them becomes available and is evaluated by the industry.

• Variations which base their cost saving claims on reducing the number of network elements required to implement LNP (e.g., QOR) will have little impact during the early stages of implementation when few of these elements are actually deployed.

- Since LRN is a component of all solutions, deploying LRN will cause no stranded investment. If the proposed alternative can withstand a rigorous industry evaluation, its subsequent deployment will simply incorporate the LRN components already deployed.

• LRN is a major component of the QOR solution. LRN will route all calls to numbers ported to other carriers and all calls which require operator handling.

- Under QOR, all end office switches will require both QOR and LRN software. LRN software deployed ahead of QOR would simply be integrated into the QOR call routing model.

Telephone Number Portability
CC Docket No. 95-116

Number Portability Architecture

LRN variations should be jointly evaluated by all sectors of the industry

- To avoid introducing competitive bias into the process, these variations, and any subsequent ones, should be evaluated by a cross-section of industry participants.

- Lowering the cost of implementing LNP is a proper objective. However, LRN variations must ensure real cost savings while remaining competitively neutral. They must also preserve a customers ability to switch local carriers without impairing service quality, as required by the Telecommunications Act.

Caching: Reduces database queries by storing routing information for frequently called numbers in switch memory. By reducing the number of database queries required, LNP implementation costs will be lower. The savings generated by caching will benefit all carriers and will continue to reduce LNP costs for the life of the LRN architecture.

SCP Optimization (N + k): Attempts to lower the cost of implementing LNP by reducing the number of redundant SCPs required to maintain LNP reliability. The savings generated by this SCP optimization will benefit all carriers and will continue to reduce LNP costs for the life of the LRN architecture.

QOR: Query on release is based on an assumption that most lines will remain presubscribed to the ILEC for local service. It therefore attempts to lower the cost of implementing LNP by reducing the number of LRN database queries initiated during the early stages of number portability deployment. This in turn reduces the number of SCPs required to support the LNP architecture. If there are savings generated by QOR, they will only benefit the ILECs and will only reduce LNP costs until such time as full LRN deployment is required.

Telephone Number Portability
CC Docket No. 95-116

LRN Implementation Schedule

105 MSAs by the third quarter 1998

Regional LRN Deployment

In each MSA, deployment would include 25 switches: 20 ILEC and 5 CLEC

2Q96	3Q96	4Q96	1Q97	2Q97	3Q97	4Q97	1Q98	2Q98	3Q98
					1	3	3	4	4

Total: 15 MSAs per region x 7 regions = 105 MSAs deployed by 3Q98

Service Management System ("SMS") Installation

2Q96	3Q96	4Q96	1Q97	2Q97	3Q97
review state RFPs	Issue Nat'l RFP & select vendor	develop req'ts	←	Build SMS	→ Test SMS

Telephone Number Portability
CC Docket No. 95-116

The Carrier's Choice Proposal

Carrier's Choice will delay the implementation of number portability

• The use of varying solutions by carriers will require time for all of the examination, carrier input, architecture refinement, and generic and application software development required to establish a general availability date.

- This type of work effort was performed while evaluating LRN, RTP, CPC, and LANP.
  - For over a year and a half the industry worked diligently to evaluate these alternatives.
  - Stringent policy guidelines have been established and applied to these alternatives.
  - Broad agreement about which alternative provides the best framework for deploying LNP has already been reached.

Carrier's Choice raises network interoperability issues which must be resolved

• The seamless and efficient interoperability of the nation's telecommunications networks depends on an extensive work effort to address the coexistence of multiple carriers utilizing varying solutions simultaneously.

- QOR requires even non-QOR networks to have the capability to process QOR signaling.
  - QOR specifications indicate routing attempts should not be made to switches unable to recognize QOR signaling.
- Commission oversight of the implementation, coordination and testing of individual solutions will be significant and necessary to avoid technical inconsistencies.

Telephone Number Portability
CC Docket No. 95-116

Query On Release

QOR is not a permanent solution and does not fulfill the requirements of the 1996 Act

- QOR provides a different level of service to subscribers with numbers which have ported to a CLEC.
  - Calls to customers who have switched carriers would always be subject to additional call processing steps that other calls would not.
  - AT&T estimates that QOR would impose an incremental post-dial delay of more than one second on calls to "ported" numbers, as compared to calls to "non-ported" numbers.
  - Customers of CLECs will not retain the use of a line number at the same location without the impairment of quality, reliability, or convenience when switching carriers.

- By design, QOR is intended to serve as an interim measure, transitional to a permanent number portability solution
  - QOR is designed to be replaced by LRN.
  - It would be illogical to postpone the deployment of LRN -- a currently feasible, competitively neutral, permanent solution -- in order to permit the development of an interim solution which will ultimately be replaced by LRN.

Telephone Number Portability
CC Docket No. 95-116

Query On Release

QOR cost savings have not been substantiated and may be illusory

- During the initial phases of number portability, differences in cost appear to be minimal. Using California as an example:

Call Model	No. of SCP Pairs	Cost per SCP Pair	Total Cost	Difference	Subscriber Lines
LRN Location Routing Number	4 PacTel 2 GTE	$2.5M	$10.0M $5.0M $15.0M	$7.5M $2.5M	6 million *
QOR Query On Release	1 PacTel 1 GTE	$2.5M	$2.5M $2.5M $5.0M		6 million *

* represents one third of the 18 million subscriber lines in the state of California

  - Spread over the period from 2Q96 to 3Q98, this difference amounts to less than 2 cents per month per PacTel subscriber line and no more than 4 cents per month per GTE subscriber line.
  - When the transition from QOR to LRN occurs, this cost difference will likely disappear completely as the LEC will incur the cost of full LRN deployment.

- The industry has not yet quantified the costs of:
  - QOR requiring software updates in all intermediary and donor switches as soon as the 1st QOR switch is turned up or that both QOR and LRN software is needed in all switches.
  - The cost of updating non-QOR networks, allowing them to process QOR signaling, has also not been quantified.

These costs are not incurred when deploying LRN

Telephone Number Portability
CC Docket No. 95-116

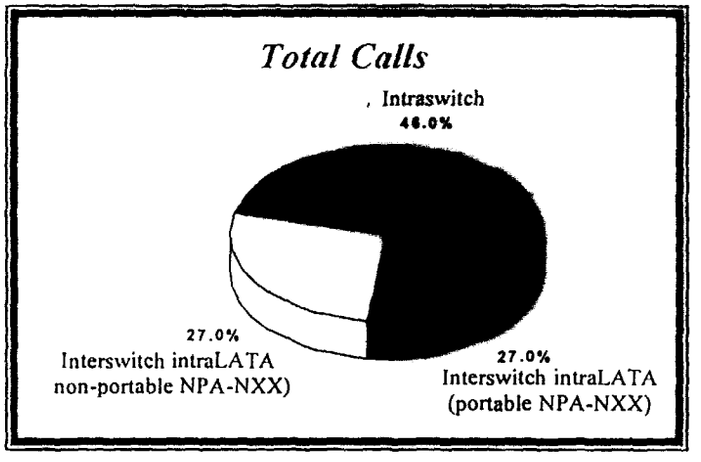
Query On Release

Not all calls present an opportunity for cost savings through QOR

- Neither QOR nor LRN require ILEC database queries on intraswitch calls or on interLATA calls; 46% of total calls.

- The only calls which present an opportunity for cost savings through QOR are interswitch intraLATA calls.
  - These calls represent 54% of total calls.*
    - Assuming half of the NPA-NXXs in a service area are portable (a high estimate during the early stages of LNP deployment), only half of the interswitch intraLATA calls would require a database query.

- This being the case, QOR would reduce query costs on only 27% of all calls.



* With the introduction in the states of intraLATA toll competition, increasingly, IXCs are handling more intraLATA toll calls; therefore, less than 54% of all call attempts would be candidates for cost savings through QOR. After adjusting call attempts for intraLATA toll calls handled by IXCs, the remaining call attempts affording opportunities for cost savings through QOR can be reduced even further by removing all operator handled calls. QOR uses the LRN call model for all operator handled calls.

Telephone Number Portability
CC Docket No. 95-116

LNP Cost Recovery

Cost Recovery Principle

All LNP-participating local service providers should share in the recovery of LNP costs, *in some manner that is proportionate to each carrier's share of the portability area customer base.*

- Competitively neutral and proportionate cost recovery recognizes that all customers will benefit from LNP because it is essential for meaningful local exchange competition, and competition will result in lower prices and better and higher quality services for all local service customers.

Cost Categories

There are two main categories of costs associated with LNP implementation:

- Carrier internal network costs, and
- Number Portability Administration Center/Service Management System ("NPAC/SMS") costs.

Cost Recovery Plan

1) Each N-1 carrier should be responsible for recovery of its own internal network implementation costs.
2) - ILECs must not be permitted to recover internal network implementation and NPAC/SMS costs through access charges.
   - These costs should not receive exogenous cost treatment under price cap rules, to the extent that such treatment would result in increases in rates paid by other carriers.
3) CLECs should determine their own cost recovery mechanisms and not be required to recover network implementation and/or NPAC/SMS costs in any specific manner from their end users (e.g., through a surcharge on their end users' bills).

Telephone Number Portability
CC Docket No. 95-116

LNP Cost Recovery

4) NPAC/SMS costs are common to all local service providers that upload or download dialed numbers numbers to or from their networks and to some extent to other carriers and entities that receive download broadcasts from the NPAC/SMS but are not involved in porting dialed numbers.

The FCC should recommend the following NPAC/SMS cost recovery elements:

- **Service Establishment Charge:** A non-recurring charge for each log-on ID assigned.
- **NPAC/SMS Access:** A monthly recurring charge for dial-up connections established for the purpose of uploading and/or downloading information to or from the NPAC/SMS.
- **Miscellaneous Charges:** Separate charges will apply for miscellaneous functions requested by NPAC/SMS users (e.g., reports, interface testing, custom audits, specialized downloads,etc.).

- **Porting Carrier Allocation Charge:** All costs not recovered through the charges described above will be shared proportionately by all participating local service providers. The proportionate share may be calculated on either:
    1) each porting carrier's share of total working telephone numbers in portable NXXs, or
    2) each porting carrier's share of total portable NXXs.

The selection of allocation methods should be at the ILECs choice during the 24 month period following initial LNP implementation. At the end of the 24 month period, allocation should be based on each carrier's share of working telephone numbers in portable NXXs.

Telephone Number Portability
CC Docket No. 95-116

LNP Implementation Costs

AT&T used a theoretical 5M line network to establish per line LNP costs

5,000,000	lines in the network
18,000	lines per switch
278	switches
6	operator services switches
5	SCPs

- Using a 5 year cost recovery schedule, this model yielded per line costs* of $0.25 to $0.30 per month.
- The total present value of these per line costs is calculated to be between $11.77 and $14.12.
- These figures were then applied to the total number of lines for the nation to reach a LNP cost estimate of $1.7B (exchange).
- NPAC/SMS costs were derived by extrapolating the industry's costs to deploy a similar system. for 800 service telephone numbers, yielding cost estimates of $25M to deploy the system and annual operating costs of $75M.

* only costs directly attributable to local number portability were included. General network upgrades which will allow carrier networks to implement other capabilities and/or services were, properly, not included in these calculations

RECEIPT

May 8, 1996
Refiled May 9, 1996
(With original signatures)

EX PARTE

RECEIVED

MAY - 9 1996

Ms. Regina Keeney
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, NW, Room 500
Washington, D.C. 20554

Re: Telephone Number Portability, CC Docket No. 95-116

Dear Ms. Keeney,

The undersigned parties -- all participants in the Illinois Local Number Portability ("LNP") workshop process -- wish to take this opportunity to encourage the Commission to adopt the Location Routing Number ("LRN") solution as the nationwide, long term number portability architecture. We believe this will most efficiently and expeditiously meet the requirements of the Telecommunications Act of 1996 ("the Act") to implement number portability for local exchange customers.

Despite the suggestions of other carriers[1], LRN *has* achieved acceptance throughout the industry as the best solution to implement permanent provider portability. The Illinois workshop, like other state commission-sponsored LNP industry efforts, includes a cross section of national and local industry participants -- LECs, CLECs, interexchange carriers and cellular carriers.[2] Support for LRN has by no means been confined to Illinois, or to Ameritech among the RBOCs. Similar industry groups across the country -- including in New York, Maryland, Georgia, Washington and Colorado -- have conducted extensive reviews of available alternatives and likewise voted LRN as the best solution.

The Illinois workshop applied stringent policy criteria to its selection of a permanent LNP

---

[1]E.g., Pacific Bell presentation and letter to the Common Carrier Bureau on April 11, 1996, in CC Docket 95-116.

[2]The Illinois workshop participants include Ameritech, AT&T, GTE, Cellular One, MCI and MCImetro, Sprint Communications Company, L.P., Central Telephone Co. of Illinois, Time Warner, TCG, MFS, the Illinois Commerce Commission Staff, and others.

architecture, and LRN met or exceeded all of them. The criteria were: 1) national compatability; 2) expandable to accommodate location and service portability; 3) causes no change in how end users originate or terminate calls; 4) all participating providers can deploy the same architecture; 5) does not require routing of traffic through the incumbent LEC networks; 6) accommodates access to number portability databases at multiple locations within networks; 7) administration is performed by a neutral third-party; 8) causes no degradation of service or loss of functionality; 9) consistency with existing network infrastructure and standards; 10) conserves numbers and codes; 11) not proprietary to any single manufacturer; and 12) supports 911/E911. The undersigned parties believe these criteria are essential to any number portability architecture, whether selected for Illinois or anywhere else in the nation. Since LRN meets all of the above architecture criteria, it is an ideal number portability template for all jurisdictions.

Following its review of alternatives and selection of LRN, the Illinois industry workshop participants obtained commitments from all major switch manufacturers to deliver LRN software during second quarter 1997.[3] A Stipulation and Agreement to deploy the LRN architecture in MSA-1 (the Chicago area) was signed by most of the workshop participants and approved by the Illinois Commerce Commission ("ICC").[4] In addition, the participants completed requirements for a neutral third-party database administration system, issued a Request For Proposal ("RFP"), and recently selected a vendor to administer the LNP database (thus meeting the Act's requirement for third-party database administration). Finally, the participants continue to make progress on all related areas of LNP implementation, including operational support systems ("OSS"), rating and billing, network operations, and operator services issues. Significantly, after considerable review to date, no participant has identified any problems in these related implementation areas that would alter target implementation dates.

The undersigned parties believe the open, industry consensus-driven efforts in Illinois and elsewhere have been extremely successful in identifying a robust, nondiscriminatory, and efficient method of implementing LNP in the earliest time frame possible. However, the parties are concerned that proposals by other carriers to permit alternate solutions will delay the deployment of LNP. Specifically, one alternative to the basic LRN architecture, Query On Release ("QOR") proposed by Pacific Bell, is still under development and will not be universally available at the time of Illinois' second quarter 1997 target implementation date. QOR has not been subjected to any of the extensive examination, refinement, and generic and application software development that has been completed for LRN. Additionally, the merits of deploying this alternative are still being debated. If the industry (and especially switch vendors) were

---

[3]Although it can provide tandem and end office LRN software by second quarter 1997, Ericsson has recently indicated to MFS that its SSP modifications will not be available until third quarter 1997.

[4]The Stipulation and Agreement was signed by Ameritech, AT&T, Cellular One, MCI and MCImetro, Sprint Communications Company, L.P., Central Telephone Co. of Illinois, Teleport, and MFS.

required to wait or start over at this point to accommodate QOR development, or development of any solution other than LRN in their initial software releases, LNP deployment would be significantly delayed. The undersigned parties are especially concerned that the second quarter 1997 LRN availability dates provided by switch vendors will be put in jeopardy if the vendors are diverted from the primary goal of developing software for the permanent LNP solution in order to simultaneously pursue development of interim routing schemes such as QOR.

The undersigned parties believe the Commission should immediately adopt LRN as the nationwide, long-term LNP architecture. The record in this docket and in the numerous state workshop processes demonstrate that LRN is clearly the number portability solution that can most effectively, efficiently and rapidly promote local exchange competition, in fulfillment of the Act's requirements.

Sincerely,

Terry D. Appenzeller
Vice President - Open Market Strategy
Ameritech

Pamela Kenworthy
Senior Manager - Number Resource Planning
MFS Intelenet of Illinois, Inc.

R. G. Salemme
Vice President - Federal Government Affairs
AT&T Corporation

Edmund P. Gould
Vice President-Technology
Teleport Communications Group, Inc.

Phillip Felice
Regulatory Manager
Central Telephone Co. Of Illinois

Janis Stahlhut
Vice President - Regulatory Operations
Time Warner Communications

Donald F. Evans
Vice President - Federal Regulatory Affairs
MCI Telecommunications Corporation

Ron Havens
Director - Industry Forums
Sprint Communications Company, L.P.

significantly delayed. The undersigned parties are especially concerned that the second quarter 1997 LRN availability dates provided by switch vendors will be put in jeopardy if the vendors are diverted from the primary goal of developing software for the permanent LNP solution in order to simultaneously pursue development of interim routing schemes such as QOR.

The undersigned parties believe the Commission should immediately adopt LRN as the nationwide, long-term LNP architecture. The record in this docket and in the numerous state workshop processes demonstrate that LRN is clearly the number portability solution that can most effectively, efficiently and rapidly promote local exchange competition, in fulfillment of the Act's requirements.

Sincerely,

Terry L. Appenzeller
Vice President - Open Market Strategy
Ameritech

Pamela Kenworthy
Senior Manager - Number Resource Planning
MFS Intelenet of Illinois, Inc.

R. G. Salemme
Vice President - Federal Government Affairs
AT&T Corporation

Edmund P. Gould
Vice President-Technology
Teleport Communications Group, Inc.

Phillip Felice
Regulatory Manager
Central Telephone Co. Of Illinois

Janis Stahlhut
Vice President - Regulatory Operations
Time Warner Communications

Donald J. Evans
Vice President - Federal Regulatory Affairs
MCI Telecommunications Corporation

Ron Havens
Director - Industry Forums
Sprint Communications Company, L.P.

significantly delayed. The undersigned parties are especially concerned that the second quarter 1997 LRN availability dates provided by switch vendors will be put in jeopardy if the vendors are diverted from the primary goal of developing software for the permanent LNP solution in order to simultaneously pursue development of interim routing schemes such as QOR.

The undersigned parties believe the Commission should immediately adopt LRN as the nationwide, long-term LNP architecture. The record in this docket and in the numerous state workshop processes demonstrate that LRN is clearly the number portability solution that can most effectively, efficiently and rapidly promote local exchange competition, in fulfillment of the Act's requirements.

Sincerely,

Terry D. Appenzeller
Vice President - Open Market Strategy
Ameritech

Pamela Kenworthy
Senior Manager - Number Resource Planning
MFS Intelenet of Illinois, Inc.

R. G. Salemme
Vice President - Federal Government Affairs
AT&T Corporation

Edmund P. Gould
Vice President-Technology
Teleport Communications Group, Inc.

Phillip Felice
Regulatory Manager
Central Telephone Co. Of Illinois

Janis Stahlhut
Vice President - Regulatory Operations
Time Warner Communications

Donald F. Evans
Vice President - Federal Regulatory Affairs
MCI Telecommunications Corporation

Ron Havens
Director - Industry Forums
Sprint Communications Company, L.P.

significantly delayed. The undersigned parties are especially concerned that the second quarter 1997 LRN availability dates provided by switch vendors will be put in jeopardy if the vendors are diverted from the primary goal of developing software for the permanent LNP solution in order to simultaneously pursue development of interim routing schemes such as QOR.

The undersigned parties believe the Commission should immediately adopt LRN as the nationwide, long-term LNP architecture. The record in this docket and in the numerous state workshop processes demonstrate that LRN is clearly the number portability solution that can most effectively, efficiently and rapidly promote local exchange competition, in fulfillment of the Act's requirements.

Sincerely,

Terry D. Appenzeller
Vice President - Open Market Strategy
Ameritech

Pamela Kenworthy
Pamela Kenworthy
Senior Manager - Number Resource Planning
MFS Intelenet of Illinois, Inc.

R. G. Salemme
Vice President - Federal Government Affairs
AT&T Corporation

Edmund P. Gould
Vice President-Technology
Teleport Communications Group, Inc.

Phillip Felice
Regulatory Manager
Central Telephone Co. Of Illinois

Janis Stahlhut
Vice President - Regulatory Operations
Time Warner Communications

Donald F. Evans
Vice President - Federal Regulatory Affairs
MCI Telecommunications Corporation

Ron Havens
Director - Industry Forums
Sprint Communications Company, L.P.

significantly delayed. The undersigned parties are especially concerned that the second quarter 1997 LRN availability dates provided by switch vendors will be put in jeopardy if the vendors are diverted from the primary goal of developing software for the permanent LNP solution in order to simultaneously pursue development of interim routing schemes such as QOR.

The undersigned parties believe the Commission should immediately adopt LRN as the nationwide, long-term LNP architecture. The record in this docket and in the numerous state workshop processes demonstrate that LRN is clearly the number portability solution that can most effectively, efficiently and rapidly promote local exchange competition, in fulfillment of the Act's requirements.

Sincerely,

Terry D. Appenzeller
Vice President - Open Market Strategy
Ameritech

Pamela Kenworthy
Senior Manager - Number Resource Planning
MFS Intelenet of Illinois, Inc.

R. G. Sebenne
Vice President - Federal Government Affairs
AT&T Corporation

Edmund P. Gould
Vice President-Technology
Teleport Communications Group, Inc.

Phillip Felico
Regulatory Manager
Central Telephone Co. Of Illinois

Louis Stahlhut
Vice President - Regulatory Operations
Time Warner Communications

Donald F. Evans
Vice President - Federal Regulatory Affairs
MCI Telecommunications Corporation

Ron Havens
Director - Industry Forums
Sprint Communications Company, L.P.

significantly delayed. The undersigned parties are especially concerned that the second quarter 1997 LRN availability dates provided by switch vendors will be put in jeopardy if the vendors are diverted from the primary goal of developing software for the permanent LNP solution in order to simultaneously pursue development of interim routing schemes such as QOR.

The undersigned parties believe the Commission should immediately adopt LRN as the nationwide, long-term LNP architecture. The record in this docket and in the numerous state workshop processes demonstrate that LRN is clearly the number portability solution that can most effectively, efficiently and rapidly promote local exchange competition, in fulfillment of the Act's requirements.

Sincerely,

Terry D. Appenzeller
Vice President - Open Market Strategy
Ameritech

Pamela Kenworthy
Senior Manager - Number Resource Planning
MFS Intelenet of Illinois, Inc.

R. G. Salemme
Vice President - Federal Government Affairs
AT&T Corporation

Edmund P. Gould
Vice President-Technology
Teleport Communications Group, Inc.

Phillip Felice
Regulatory Manager
Central Telephone Co. Of Illinois

Janis Stahlhut
Vice President - Regulatory Operations
Time Warner Communications

Donald F. Evans
Vice President - Federal Regulatory Affairs
MCI Telecommunications Corporation

Ron Havens
Director - Industry Forums
Sprint Communications Company, L.P.

Betsy J. Brady
Federal Government Affairs
Director and Attorney

Suite 1000
1120 20th Street, N.W.
Washington, DC 20036
202 457-3824
FAX 202 457-2545

April 24, 1996

Mr. Jason Karp
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Telephone Number Portability, CC Docket No. 95-116

Dear Mr. Karp,

This letter will respond to your request to Karen Weis, Julie Ladieu-Walton, and Patricia VanMidde of AT&T for further information in connection with the above-referenced docket. AT&T welcomes the opportunity to provide further information and guidance on the implementation of a permanent number portability solution. Under the Telecommunications Act of 1996, the Commission is required to adopt regulations that will result in the prompt nationwide deployment of statutorily-defined number portability for local exchange customers. AT&T believes that the FCC can and should meet this requirement by issuing an order designating the Location Routing Number ("LRN") solution as the sole, permanent number portability solution and setting forth a detailed implementation schedule for its deployment.

First, this letter will elaborate on the implementation schedule for the industry-consensus permanent number portability solution - the Location Routing Number ("LRN") solution - previously described in AT&T's Comments in this proceeding. Second, this letter will explain the delays, inefficiencies, and anti-competitive effects that would result from proposals which would allow various carriers to select the solutions to be used to support number portability in their networks. In addition, this letter will address the latest in a series of proposed alternative solutions, the Query on Release ("QOR") call model. This additional information about the LRN implementation schedule, the "Carrier's Choice" approach, and QOR, will buttress the already convincing record that demonstrates LRN is the sole solution that meets the statutory requirement for local number portability.